

Clyde L. McClelland

50 Fairway Oaks Drive
Sedona, Arizona 86351
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Public Docket Office
Department of Transportation
400 Seventh Street, S.W.
Room PL-401
Washington, D.C. 20590-0001

RE: [Docket No. FAA-2001-111229]
Firearms, Less-Than-Lethal Weapons and Emergency Services on Commercial Flights.

Gentlepeople:

The following comments are offered in response to your request: Docket No. FAA-2001-111229:

SUMMARY

A. Cockpit:

1. One or more of the cockpit crew on commercial aircraft **should** be armed with appropriate firearms. (The cockpit door should also be reinforced.) The firearm should be small, maneuverable and of power sufficient to stop a determined assailant. Only a handgun meets these criteria. I recommend a short-barreled revolver of .45 caliber, capable of firing special ammunition such as “bean bags.”
2. The armed individual, or individuals, should volunteer for this duty, i.e. neither the chief pilot nor any other individual should possess a firearm solely by virtue of his position.
3. The armed individual, or individuals, should receive special training in the use of firearms, especially in the aircraft environment. Training should be essentially continuous with frequent qualification tests and certifications.
3. The Chief Pilot should – of course – command the aircraft and determine when, or if, the use of a firearm is necessary. Certain criteria should be agreed in advance so that the cockpit crew will take necessary action even if the commander is disabled or dead.

B: Cabin:

4. No member of the cabin crew should possess a firearm. Their duties make it difficult to protect the weapon against disarmament.
5. Air Marshals – and similarly highly-trained, physically active personnel – should be present in the cabin. It is doubtful that logistical and financial considerations will permit deployment of enough air marshals to provide complete coverage and security for every flight.
6. Consequently, air marshals should be supported by armed individuals such as law enforcement officers traveling on other business and private citizens who are highly trained in the use of firearms. Most private

citizens who satisfy this criterion will possess a State concealed weapons permit. These individuals (law enforcement officers and citizens -- all volunteers) should receive special training in the aircraft environment and be tested, qualified and individually certified under the same restrictive standards required for armed cockpit personnel. I have no doubt that many qualified citizens – frequent travelers – would volunteer to participate. They would be identified by special credentials exhibited at check-in for coordination with any air marshals assigned to the flight.

C: General:

7. “ ‘Less-than-lethal’ weapons” is an oxymoron. Most such devices require close combat skills and are unpredictable and unreliable in action. They often offer only one shot! Some people, particularly those under the influence of drugs, may be almost immune to electrical shock. The safety of the aircraft, crew and passengers should never depend on “stun guns,” “tasers” and similar devices.

8. “Pre-fragmented,” “bean-bag” and other special ammunition for firearms may have some utility, primarily to prevent excessive damage to the aircraft. The FAA should test such ammunition, certify it for use, and issue it to all individuals authorized to carry arms on aircraft.

D: Firearms training, qualification and certification:

9. There are many first class firearms academies capable of training armed personnel for aircraft. Gunsite Academy, Paulden, Arizona and the Front Sight Firearms Training Institute, Las Vegas, Nevada, are two schools that would appear at the top of most lists. All personnel authorized to carry arms should be a graduate of such a top-level school.

10. The FAA should provide supplemental training to focus on the aircraft environment. This advanced training should be available to all applicants willing to submit to a criminal background investigation; who have already graduated from a top-level school; and who are willing to commit themselves to a minimum level of participation in this program.

11. Every certified individual should be a frequent participant in one of the “practical” shooting sports, and be a classified competitor. For example: The International Defensive Pistol Association sponsors matches which test, *inter alia*, the ability of the competitor to meet unforeseen challenges, and to do so rapidly and accurately. There are many such matches every month. Many law enforcement officers participate enthusiastically and aircraft personnel would be welcome. Once a year qualification – a typical standard for police – is not adequate to meet the demands of armed airplane security. Competition once a month and qualification / certification at least twice a year should be required. Every individual authorized to carry a firearm aboard an aircraft should be classified “Sharpshooter” or better in the sport he or she follows.

Summary of my qualifications to offer the views above:

Captain, Parachute Infantry, WWII; Competitive shooter for 65 years, including one war; Ph.D., Nuclear Physics, MIT; about 16 years service in the Foreign Service of the United States = frequent international traveler; Deputy Assistant Secretary of State for Scientific and Technological Affairs. Now: Retired.

Thank you for the opportunity to offer my views. I would be glad to expand on any topic in the summary above. This is an important issue. We must no longer offer disarmed victims to international terrorism.

Sincerely,

Clyde L. McClelland
(928)-284-1957
clydem@sedona.net